## UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF MASSACHUSETTS (Eastern Division)

In re:			)		
			)		
THOMAS	G.	DOLAN,	)	Chapter	7
			)	Case No.	19-12386-FJB
		Debtor.	)		
			)		

SIGNED STATEMENT OF CRAIG R. JALBERT, CIRA IN SUPPORT OF APPLICATION FOR EMPLOYMENT PURSUANT TO BANKRUPTCY RULE 2014(a) AND LOCAL RULE 2014-1

I, Craig R. Jalbert, being duly sworn, do hereby depose and state as follows:

- 1. I am a Certified Insolvency and Restructuring Advisor and a principal of the accounting firm of Verdolino & Lowey,

  P.C. (the "Firm"), whose office is located at 124 Washington

  Street, Foxborough, Massachusetts. I am generally familiar with the business of the Firm and have made inquiry concerning the facts set forth herein prior to making this Affidavit.
- 2. I hereby represent that neither I nor any member of my Firm holds or represents any interest adverse to the estate of the above-named Debtor.
- 3. My and my Firm's connection with the Debtor, any Creditor, or other party of interest, their respective attorneys and accountants are as follows:
  - (a) My Firm represents Joseph G. Butler ("Butler"), the

Chapter 7 Trustee in this case, in his capacity as Chapter 7 and 11 Trustee in many other unrelated bankruptcy cases including, but not limited to: Mike Delprete & Sons Trucking, LLC (Case No. 15-11570-FJB); Patrick M. and Jodi H Osgood (Case No. 10-15097-HJB); Paul S. Brickman (Case No. 15-13665-FJB); M E Neuber Industrial Diamonds Co., Inc. (Case No. 15-13670-FJB); Scott F. White (Case No. 14-10537-FJB); BlueLuna, LLC (Case No. 14-10572-FJB); Scott Peter Brogan (Case No. 15-11621-FJB); Martin J. Joyce (Case No. 13-12200-HJB); Goodfella's Pizza (Case No. 15-11192-JNF); Peter Wojtkun (Case No. 13-12719-MSH); Uwagboe O. Oru-Lawrence (Case No. 13-17250-MSH); Currier & Associates, Inc. (Case No. 16-12731-JNF); Mark Lepler (Case No. 16-10070-FJB); Uwagboe O. Oru-Lawrence (Case No. 13-17250-MSH); Anthony and Cheryl Desimone (Case No. 14-14271-JNF); James S. Dilday (Case No. 14-13540-FJB); Michael R. Lissack (Case No. 15-14905-MSH); Eastern Towers, Inc. (Case No. 06-149092-JNF); Bulbs and Lamps Corp. (Case No. 17-13196-JNF); Paul and Mary Lambert (Case No. 11-21753-MSH); Eric H. and Joan F. Carlson (Case No. 17-14625-JNF); LeBron Bonney Company (Case No. 19-10856-MSH); Peter Wojtkun (Case No. 13-12719-MSH); Jessica Veincasa (Case No. 18-11929-MSH); Thomas and Katherine Bateman (Case No. 17-11217-FJB);

JMF CAB, Inc. (Case No. 19-11269-MSH); NSL Blue Hills, LLC (Case No. 20-10983-MSH); NSL Brigham, LLC (Case No. 20-10984-MSH); Charlwell Operating LLC and Kimwell Operating LLC (Case No. 20-10977-MSH); NSL Country Gardens LLC (Case No. 20-10985-MSH); NSL Crawford LLC (Case No. 20-10986-MSH); NSL Franklin, LLC (Case No. 20-10987-MSH); NSL Hanover LLC (Case No. 20-10988-MSH); KD Operating LLC (Case No. 20-10982-MSH); Lynda Jean DeBiccari (Case No. 16-13538-FJB); Richard J. Silva (Case No. 18-13128-MSH); Manraj, Inc. (Case No. 19-11910-FJB).

(b) Butler represents various parties of interest in other wholly unrelated cases in which the Firm is also - employed including, but not limited to: JNH, LLC.

(Case No. 15-14469-MSH) where Butler represents an Interested Party and the Firm is the Trustee's Accountant; Alice E. McNamara (Case No. 17-11943-MSH) where Butler represents the Debtor and the Firm is the Trustee's Accountant; Eire Electric, LLC (Case No. 18-1220-MSH) where Butler represents the Debtor and the Firm is the Trustee's Accountant; Jason and Jennifer Aubee (Case No. 18-10379-FJB) where Butler represents the Debtor and the Firm is the Trustee's Accountant; Prashanth Gurkar and Leanne- Young (Case No. 18-10879) where Butler represents the Joint Debtor and the Firm

is the Trustee's Accountant; Boonstle, Inc. (Case No. 19-14405-JEB) where Butler represents the Debtor and the Firm is the Trustee's Accountant; Rania L. Ibrahim (Case No. 20-10527-MSH) where Butler represents the Debtor and the Firm is the Trustee's Accountant; and, NSL Blue Hills, LLC (Case No. 20-10983-MSH), NSL Brigham, LLC (Case No. 20-10984-MSH), Charlwell Operating LLC, Kimwell Operating LLC (Case No. 20-1985-MSH), NSL Country Gardens LLC (Case No. 20-1985-MSH), NSL Crawford, LLC (Case No. 20-1986-MSH), NSL Franklin LLC (Case No. 20-10987-MSH), NSL Hanover, LLC (Case No. 20-10988-MSH) and KD Operating LLC (Case No. 20-10982-MSH) and where Butler is the Trustee and I am the Sole Manager.

- this case. D&M represents various parties of interest in other wholly unrelated bankruptcy cases in which the Firm and its employees are employed including, but not limited to: Debra L. Feldman (Case No. 16-13432-MSH) where D&M represents the Debtor and the Trustee's Accountant; Jeffrey R. Mazer (Case No. 18-12437-MSH) where D&M represents a Creditor and the Firm is the Trustee's Accountant. The Firm does not represent D&M, their attorneys or their clients in this case.
- (d) Sherin and Lodgen, LLP ("S&L") represents an

Interested Party in this case. S&L represents various parties of interest in other wholly unrelated bankruptcy cases in which the Firm and its employees are employed including, but not limited to: The Paper Store, LLC (Case No. 20-40743-CJP) where S&L represents a Creditor and the Firm is the Debtor's Accountant. The Firm does not represent S&L, their attorneys or their clients in this case.

- (e) Bernkopf Goodman, LLP ("BG") represents a Creditor in this case. BG represents various parties of interest in other wholly unrelated cases in which the Firm is also employed including, but not limited to: Denise and Donald Witherell (Case No. 16-10871-JNF) where BG represents the Defendant and the Firm is the Trustee's Accountant; Uwagboe O. Oru-Lawrence (Case No. 13-17250-MSH) where BG represents a Creditor and the Firm is the Trustee's Accountant; Mary L. Lyons (Case No. 16-12223-MSH) where BG represents a Creditor and the Firm is the Trustee's Accountant; SORT, LLC (Case No. 18-10160-FJB) where BG represents a Creditor and the Firm is the Trustee's Accountant. The Firm does not represent BG, their attorneys or their client in this case.
- 4. I hereby represent that I have agreed not to share with any persons the compensation to be paid for the accounting

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services rendered in this case, except with the Firm.

- 5. Neither I nor my Firm has received a retainer in connection with this matter.
- 6. I shall amend this statement immediately upon my learning that (a) any of the within representations are incorrect or (b) there is any change of circumstance relating thereto.
- 7. I have reviewed the provisions of MLBR 2016(a)(1) of the Local Rules of Bankruptcy Procedure for this District.
- 8. Notwithstanding the foregoing, I hereby represent that I and each member of my Firm are "disinterested persons" as that term is defined in 11 U.S.C. Sec. 101(14).

Signed under the pains and penalties of perjury this  $\underline{21st}$  day of September 2020.

Craig R. Jalbert, CIRA Verdolino & Lowey, P.C. 124 Washington Street Foxboro, MA 02035 (508) 543-1720

# UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF MASSACHUSETTS (Eastern Division)

In re:		· · · · · · · · · · · · · · · · · · ·		
111 10.		)		
		)		
THOMAS G.	DOLAN,	)	Chapter	7
		)	Case No.	19-12386-FJB
	Debtor.	)		
		)		

#### DECLARATION RE: ELECTRONIC FILING

I, Craig R. Jalbert, hereby declare under penalty of perjury that all of the information contained in my Signed Statement Of Craig R. Jalbert, In Support Of Application For Employment Pursuant To Bankruptcy Rule 2014(A) And Local Rule 2014-1 (the "Document"), filed electronically, is true and correct. I understand that this DECLARATION is to be filed with the Clerk of Court electronically concurrently with the electronic filing of the Document. I understand that failure to file this DECLARATION may cause the Document to be struck and any request contained or relying therein to be denied, without further notice.

I further understand that pursuant to the Massachusetts Electronic Filing Local Rule (MEFR)-7(b) all paper documents containing original signatures executed under the penalties of perjury and filed electronically with the Court are the property of the bankruptcy estate and shall be maintained by the authorized CM/ECF Registered User for a period of five (5) years after the closing of this case.

Executed this 21st day of September 2020.

Craig R. Jalbert





### **VERDOLINO & LOWEY, P.C., Certified Public Accountants**

#### **Professional Rates (Hourly)**

*	Principals	\$495.00
	TIMOIDAID	Ψ1/2.00

• Managers \$275.00 - \$425.00

Staff \$225.00 - \$395.00

■ Bookkeepers \$225.00 - \$245.00

■ Clerical \$95.00

On September 1<sup>st</sup> of each year, the Firm reviews and adjusts the hourly rates of all employees. These rates will be in effect until August 31, 2021.